

The Honorable Marsha J. Pechman

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON AT SEATTLE

JULIE DALESSIO, an individual,

Plaintiff,

v.

UNIVERSITY OF WASHINGTON,

Defendant.

No. 2:17-cv-00642-RSM

STIPULATED MOTION TO EXTEND
THE DISCOVERY AND DISCOVERY
MOTION DEADLINE

NOTED ON MOTION CALENDAR:
October 25, 2017

I. RELIEF REQUESTED

The parties hereby request the Court grant their stipulated motion to extend the discovery motion deadline from October 27, 2017 to November 17, 2017, and the discovery cutoff from November 27, 2017 to December 19, 2017. The parties do not believe it is necessary to change any other deadlines at this time.

II. STATEMENT OF FACTS

The parties met and conferred pursuant to FRCP 26 on October 23, 2017, regarding Plaintiff's first two sets of interrogatories and requests for production of documents. *Chen Decl.*, at ¶ 2. While the discussion was productive, the parties were unable to agree regarding *at least* a majority of the items in dispute. *Id.*

Defendant filed a motion for summary judgment on August 24, 2017, that is currently pending. The parties, therefore, agree to stipulate to extending the discovery cutoff and discovery motions deadline. *Id.*

STIPULATED MOTION TO EXTEND THE DISCOVERY
AND DISCOVERY MOTION DEADLINE - 1
2:17-cv-00642-RSM

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KEATING, BUCKLIN & MCCORMACK, INC., P.S.

ATTORNEYS AT LAW
801 SECOND AVENUE, SUITE 1210
SEATTLE, WASHINGTON 98104-1518
PHONE: (206) 623-8861
FAX: (206) 223-9423

III. ISSUE STATEMENT

Should the Court extend the discovery motions deadline and discovery cutoff deadline less than a month where there is a pending motion for summary judgment and where the parties have mutually agreed to do so?

IV. EVIDENCE RELIED UPON

- Declaration of Derek Chen

V. ARGUMENT AND AUTHORITY

Pursuant to WDLCR 7(d)(1) and 10(g), the parties respectfully request the Court extend the discovery motion deadline from October 27, 2017 to November 17, 2017, and the discovery cutoff from November 27, 2017 to December 19, 2017. While the parties understand these motions are generally disfavored, the defendant believes there is sufficient cause for these short extensions.

Defendant filed a motion for summary judgment to dismiss all claims roughly two months ago, and the parties believe the Court will rule on this motion soon. The Court's ruling will possibly narrow the scope of the discovery disputes between the parties. This will likely significantly conserve both the parties' resources as well as the Court's resources if court intervention is necessary. Therefore, judicial economy as well as conservation of resources strong favors these short extensions.

In addition, the requested extensions are less than a month. The proposed extensions do not move the trial date or any other part of the case schedule. The unique circumstances of this situation are such that the short extension has the potential to significantly clarify current disputes as well as conserve resources. Neither party will be prejudiced by this extension.

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1 SIGNED this 25th day of October 2017

2 KEATING, BUCKLIN & McCORMACK,
3 INC., P.S.

4 By: /s/ Derek C. Chen

5 Derek C. Chen, WSBA #49723
6 Special Assistant Attorney General for
7 Defendant

By: /s/ Julie Dalessio

Julie Dalessio, Pro se Plaintiff

8 [PROPOSED] ORDER

9 The stipulated request for an extension IS HEREBY GRANTED, and IT IS
10 HEREBY ORDERED that the discovery motion deadline from October 27, 2017 to
11 November 17, 2017, and the discovery cutoff from November 27, 2017 to December 19,
12 2017.

13 
14
15 The Honorable Marsha J. Pechman

CERTIFICATE OF SERVICE

I hereby certify that on October 25, 2017, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Attorneys for Pro-Se Plaintiff

Julie Dalessio
1110 29th Ave.
Seattle, WA 98122
Telephone: (206) 324-2590
Email: juliedalessio@msn.com

DATED: October 25, 2017

/s/ Derek C. Chen

Derek C. Chen, WSBA #49723
Special Assistant Attorney General for
Defendant
801 Second Avenue, Suite 1210
Seattle, WA 98104-1518
Phone: (206) 623-8861
Fax: (206) 223-9423
Email: dchen@kbmlawyers.com